

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SEP 16 P 1:23

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SOUTHWESTERN BELL )  
MOBILE SYSTEMS, LLC, )  
Plaintiff )  
Counterclaim Defendant )  
v. )  
CHRISTOPHER P. KUHN, )  
Defendant )  
Counterclaim Plaintiff )  
\_\_\_\_\_

C.A. No.: 04-CV-11584-PBS COURT  
DISTRICT OF MASS

JOINT SCHEDULING STATEMENT

The plaintiff/ counterclaim defendant Southwestern Bell Mobile Systems, LLC and the defendant / counterclaim plaintiff Christopher P. Kuhn hereby submit this statement as a proposed schedule pursuant to the directives contained in Local Rule 16.1.

<u>Stage of Litigation</u>	<u>Deadline</u>
Rule 26 exchange of documents and initial disclosures	November 12, 2004
All depositions and fact discovery completed.	May 6, 2005
All motions under Fed. R. Civ. P. 56 filed	June 10, 2005
Oppositions under Fed. R. Civ. P. 56	4 weeks from date of motion
Expert disclosure and discovery	the later of July 15, 2005 or 4 weeks after summary judgment decision
Final pre-trial conference held or hearing on motion for summary judgment	as set by the Court

Trial date

as set by the Court

The parties shall separately submit their certifications required pursuant to LR 16.1(d)(3).

Respectfully submitted this 15<sup>th</sup> day of September, 20 04 :

The Tenant  
Southwestern Bell Mobile Systems, LLC  
By its counsel

The Landlord  
By his attorney

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**CERTIFICATE OF SERVICE:** I, Lois M. Farmer, hereby certify that I have served a true copy of the foregoing documents on all parties/counsel of record by forwarding the documents, first class mail postage prepaid, on 9/16/04.

Lois M. Farmer  
Lois M. Farmer, BBO# 552142